

Remarks

The Office Action dated June 1, 2005 has been received and duly noted.

Claims 1-4, 6-17 and 19-34 were rejected as being anticipated by Milberger 5,791,418. The Applicant respectfully submits that the '418 Patent does not anticipate the pending claims for reasons discussed below.

Milberger '418 is directed to a tool for shifting a valve sleeve on an outer wellhead housing. The present claims are directed to a tool and method for axially fixing upward movement of a tubular hanger with respect to a subsea wellhead housing, with the tubular hanger connected to a tubular string extending downward from the wellhead housing into the well.

The Examiner contends that Milberger '418 teaches a lockdown sleeve 17 for axially fixing upward movement of a tubing hanger with respect to a subsea wellhead housing. Member 17 is not, however, a lockdown sleeve and it does not function to axially fix upward movement of a tubular hanger with respect to the subsea wellhead housing. Should member 17 somehow be considered a lockdown sleeve, where is the tubular hanger connected to a tubular string extending downward from the subsea wellhead housing into the well? Rather than functioning as a lockdown sleeve, the inner wellhead housing 17 of Milberger '418 could functionally be considered a hanger, since it lands on the wellhead housing 11 and suspends the tubular 23 in the well. Moreover, the reference does not teach a sleeve latching mechanism, as recited in Claim 1, for axially connecting the

lockdown sleeve to an interior profile in the subsea wellhead housing, thereby fixing upward movement of the tubing hanger with respect to the wellhead housing. The inner wellhead housing 17 of Milberger '418 fails to disclose a sleeve latching mechanism for axially connecting member 17 to the subsea wellhead housing and fails to fix upward movement of a hanger with respect to the wellhead housing.

The Examiner further contends that running tool 27 of Milberger '418 discloses a tool latching mechanism 35 for axially connecting the running tool 27 to the subsea wellhead housing. The dogs 35 in Milberger '418 do not connect the running tool 27 to the outer latching profile on the subsea wellhead housing 11. This connection instead is made by the split ring 43. The Examiner further contends that this reference teaches a tool force applicator 45 for exerting a downward force after the tool latching mechanism connects the tool to the subsea wellhead housing, but the release cam 45 does not involve the operation of the dogs 35, and the release cam 45 does not exert a downward force on a seal after the tool latching mechanism connects the tool to the subsea wellhead housing, as recited in amended Claim 1. The Examiner further contends that item 45 in the cited reference is also a sleeve latching applicator for moving the sleeve latching mechanism. The release cam 45 in the cited reference does not operate to move the dogs 35, the dogs 35 do not axially connect the running tool to the subsea wellhead housing 11. The Examiner contends that Milberger '418 teaches a seal for sealing between the lockdown sleeve 17 and one of the tubular hanger and the wellhead housing in response to the downward

force. Member 17 in the cited reference is not, however, a lockdown sleeve, the Examiner has not referenced the component which constitutes the tubular hanger, and the reference fails to disclose a tool force applicator for exerting a downward force on the seal after the tool latching mechanism connects the tool to the subsea wellhead housing.

With respect to dependent Claim 2, the dogs 35 in the cited reference do not connect the running tool to the subsea wellhead housing 11. With respect to Claim 3, the cited reference does not disclose that the seal is set by downward motion of a lockdown sleeve with respect to the wellhead housing. With respect to dependent Claim 4, the cited reference does not disclose a seal carried to the subsea wellhead housing on a lower end of the lockdown sleeve. With respect to dependent Claim 7, the cited reference does not disclose a subsea wellhead housing with an inner profile to receive the sleeve latching mechanism to axially connect the lockdown sleeve to the wellhead housing. With respect to dependent Claim 9, it is not clear what component the Examiner considers the packer in the cited reference and what the Examiner considers the fluid passageway for testing sealing integrity of the seal in the cited reference. With respect to dependent Claim 10, the mechanism 45 may release the running tool from the wellhead housing, but member 45 in the cited reference is not a latching applicator moved axially by a piston to connect the lockdown sleeve to the subsea wellhead housing. With respect to dependent Claims 11 and 12, it is not clear where the Examiner considers Milberger to disclose a metal-to-metal seal as recited in Claim 10, or what component is referenced by the Examiner with respect


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to an elastomeric seal. With respect to dependent Claim 13, sleeve 17 may be hanger, but is not a lockdown sleeve to fix a tubing hanger within the wellhead housing. With respect to dependent Claim 14, the cited reference does not disclose a lockdown sleeve with a sealing profile for sealing engagement with a sealing member positioned within the sleeve. With respect to dependent Claim 15, the Examiner contends that Milberger discloses a tubular hanger, but the tubular hanger disclosed in Milberger is the member 17, which the Examiner has contended is a lockdown sleeve.

Independent Claim 16 and 26 are considered distinguishable from the cited reference for reasons set forth above. Claims which depend upon independent Claim 16 or 26 are directed to features set forth in dependent Claims 2-15.

In view of the above, early allowance of the application is requested.

Respectfully submitted,


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By: 

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